

## **EXHIBIT “C”**

IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

)  
SUNIL KUMAR, Ph.D., PRAVEEN SINHA, )  
Ph.D., )  
)  
Plaintiff, )  
) No.: 22:22-CV-07550-RGK-MAA  
vs. )  
)  
DR. JOLENE KOESTER, in her )  
official capacity as Chancellor of )  
California State University, )  
)  
Defendants. )  
-----)

DEPOSITION OF PROFESSOR FRANK S. RAVITCH  
California  
September 21, 2023  
Volume I

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CSR No. 12409  
Job No. 1033527

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1                   And that is the unfortunate reality of  
2     caste.

3           Q       Jared, can you pull up Exhibit 3?  
4           (Exhibit 3 was marked for identification and is  
5                   attached hereto.)

6                   (Document Shared on Screen)  
7                   So we talked about the definitions of  
8     caste. You were just testifying to that.

9                   And this is the Merriam-Webster's  
10    definition of caste.

11                   Can you just read the first definition?

12          A       "One of the hereditary social classes in  
13    Hinduism that restrict the occupation of their members  
14    and their association with the members of other castes."

15                   Which is interesting, usually  
16    Merriam-Webster would not make an error like that.

17          Q       So your testimony is Merriam-Webster's  
18    Dictionary is wrong?

19          A       No. My testimony is that they are saying "in  
20    Hinduism," not as a historical matter.

21                   Normally they would have used something  
22    referring more towards the past tense.

23                   Again, I'm not an expert on the  
24    Merriam-Webster Dictionary. But I would look at the  
25    other definitions as more consistent with my